

EXHIBIT G

In the Matter of:

Amazon eCommerce

September 27, 2022

Jeff Blackburn

Condensed Transcript with Word Index



For The Record, Inc.

(301) 870-8025 - www.ftrinc.net - (800) 921-5555

201



Q You can put that document aside.
MS. BOLLES: I know this has been going an hour, but I do need a top off on

202

1 water, is everybody okay?
2 MS. WILKINSON: Sure.
3 (Brief recess.)
4 BY MS. BOLLES:
5 **Q** We've seen reference to "JBlack"
6 all one word in the documents.
7 A Yes.
8 **Q** Is that you?
9 A Yes.
10 **Q** Mr. Blackburn, are you familiar
11 with an app called Signal?
12 A Yes.
13 **Q** What is Signal?
14 A It's a messaging app that's kind
15 of more secure than texting.
16 **Q** Have you ever used Signal for
17 work?
18 A Yes.
19 **Q** When did you begin using Signal
20 for work?
21 A I started -- it's the beginning of
22 2019, around there. It was related to Jeff.
23 He likes security and wanting us to have a more
24 secure way to text.
25 **Q** And which Jeff are you referencing

203

1 there?

2 A Jeff Bezos. His security team
3 asked a few of us if we could start to
4 communicate that way rather than text.

5 **Q** And you said a few of you, was
6 that the S-Team?

7 A I can't remember if it was S-Team
8 or his direct reports, but it was some senior
9 group, yeah.

10 **Q** Do you recall who on Mr. Bezos'
11 security team asked you to begin using Signal?

12 A No.

13 **Q** How big is his security team?

14 A The security team is a pretty big
15 team. There's a group -- I'm talking in the
16 past -- was responsible for his office and that
17 group is maybe four or five people.

18 **Q** Do you still use Signal for work
19 today?

20 A No.

21 **Q** Are you familiar with Signal's
22 disappearing message feature?

23 A Yes.

24 **Q** Have you ever used Signal's
25 disappearing message feature on messages about

204

1 work?

2 A No.

3 **Q** And just to be clear, when I say
4 "use," I mean whether or not you turned on the
5 disappearing message feature, if it was on,
6 that's what I mean by "use"; is that fair?

7 A Yes, but I didn't use it a lot. I
8 mean, I literally had a few different people
9 that I would use it with. And then it's not
10 like a primary way that I was communicating or
11 anything like that in the company. And I
12 wasn't, like, very familiar with those
13 functions that you're discussing. I only later
14 learned that, you know, these are -- about all
15 that functionality.

16 MS. WILKINSON: You're talking
17 about your use of Signal, generally.

18 THE WITNESS: Yes.

19 MS. WILKINSON: She was asking
20 about just the function. But you're
21 saying you didn't even use Signal.

22 THE WITNESS: I used it just for
23 the messaging application. I later on
24 learned that there's a lot more
25 functionality to it and that was after I

205

1 had come back to the company.

2 BY MS. BOLLES:

3 **Q So you learned about the**
4 **disappearing message feature after you came**
5 **back to the company?**

6 A Yes.

7 **Q Just to be clear, prior to leaving**
8 **the company, did you use the disappearing**
9 **message feature on Signal messages?**

10 A I think it's default on.

11 **Q So might you have?**

12 A I didn't use it.

13 **Q Might you have used the**
14 **disappearing message feature?**

15 A I mean, I don't know.

16 **Q Did you receive any formal or**
17 **informal instructions on how to use Signal?**

18 A I was told at a certain point by
19 our legal team to change.

20 MS. WILKINSON: You don't want to
21 reveal privileged information. All you
22 can say is --

23 THE WITNESS: -- I was told by our
24 legal.

25 MS. WILKINSON: -- to take certain

207

1 **Signal about work?**

2 A Jeff Bezos, Andy Jassy,
3 Mike Hopkins, Jen Salke. Probably a few of my
4 other direct reports. Maybe Steve Boom. Maybe
5 my finance leader. But it's a group of roughly
6 that size. I could probably count them on one
7 hand or two.

8 **Q Have you ever communicated about**
9 **Prime Video on Signal?**

10 A Probably.

11 **Q Have you ever had the disappearing**
12 **message feature turned on when discussing**
13 **Prime Video?**

14 A No, not that I know of.

15 **Q Have you communicated about**
16 **business strategy on Signal?**

17 A Perhaps. It's not something I
18 would typically do. It's mainly meant for
19 short messages and our longer communications
20 are all, as you've seen in the documents
21 obviously, you have e-mail in our documents and
22 things like that. But I may have. I can't say
23 that I have definitively, but I haven't talked
24 about strategy on Signal. I might have.

25 **Q Have you ever had the disappearing**

206

1 actions.

2 BY MS. BOLLES:

3 **Q Other than from your legal team or**
4 **counsel, did you receive any formal or informal**
5 **instructions on how to use Signal?**

6 A No.

7 **Q Did you receive any instruction**
8 **from Mr. Bezos' security team as to how to use**
9 **it?**

10 A No.

11 **Q To your knowledge, does Amazon**
12 **have a policy about Signal usage by employees?**

13 A Well, the legal team put out --
14 that's the only thing.

15 **Q So that's the only policy that**
16 **applied to Signal was from your legal counsel?**

17 A I don't know if it's a policy
18 even. It was just guidance on Signal.

19 **Q Have you asked anyone else to use**
20 **Signal for work?**

21 A Maybe people just in -- maybe
22 certain people that work closely in a group
23 with Jeff, I might have, yes. But I don't
24 remember specifically doing that.

25 **Q Who have you communicated with on**

208

1 **message feature turned on when discussing**
2 **business strategy on Signal?**

3 A I don't know. I'm not -- like I
4 was saying, I'm not really familiar with that
5 or I wasn't when I was using Signal.

6 **Q Have you communicated about**
7 **potential or actual acquisitions on Signal?**

8 A I don't know.

9 **Q What topics would you typically**
10 **communicate about on Signal?**

11 A Typically, it would be things like
12 can you do a call later today? Can you do this
13 meeting? What did you think of that? Should
14 we have another conversation? Do we need a
15 further review of X or Y. You know, that's
16 what I remember using it for.

17 **Q Why did you want to use an**
18 **encrypted messaging app to have those**
19 **communications?**

20 A I didn't want to. I didn't want
21 to. I was fine using text and e-mail. It
22 happened. And Jeff had this incident -- I
23 don't really know what happened actually, but I
24 suspect that it was because of a hack or
25 something that happened to him, we were asked

209

1 to use a more secure messaging system. I
2 understood, and I used it.

3 **Q Did you ever manually delete**
4 **messages from Signal?**

5 A Not that I remember, no.

6 **Q Other than the use of the**
7 **disappearing message feature or by manually**
8 **deleting Signal messages, have you retained all**
9 **of your messages on Signal?**

10 A Yes. I mean, I don't use it any
11 longer, as I said. I copied my phone. You've
12 got all the information. It's all there. So
13 you know everything.

14 **Q I understand you no longer use it,**
15 **did you delete the app off your phone?**

16 A It's not on my current phone. I
17 have a new phone.

18 **Q When did you upgrade your phone?**

19 A I don't know.

20 **Q Is it the iPhone 14?**

21 A Yes.

22 **Q So after that came out you**
23 **upgraded your phone?**

24 A I don't know.

25 **Q I'm just trying to get a ballpark.**

210

1 **Was it the last month, the last week?**

2 A It wasn't in the last month or
3 last week, no.

4 **Q Last six months?**

5 A Sometime in the last 12 months, I
6 would say.

7 **Q Do you need an account to use**
8 **Signal?**

9 A I don't know. I think so, yes.
10 Yes, you have to have some way to have your
11 name, so there has to be some kind of account.

12 **Q Do you know if you still have a**
13 **Signal account?**

14 A I don't know. I don't use it.

15 **Q Amazon collected Signal messages**
16 **off your phone, right?**

17 A Yes.

18 **Q Do you recall if that was during**
19 **the MGM second request?**

20 A I don't recall. I know there were
21 multiple times that it was done and we provided
22 my phone both times for as long as you wanted,
23 and you got it. So I don't know -- I don't
24 know anything about how that works. All I know
25 is someone took my phone. They took all of it.

211

1 They have it all. They did it multiple times.

2 **Q Who did you give your phone to?**

3 A A lawyer.

4 **Q Was it one of your lawyers here**
5 **today? Just the name of the lawyer, none of**
6 **the content of the communications.**

7 A I don't know who it was. My
8 assistant did it.

9 **Q Do you recall the dates of the**
10 **Signal message collections?**

11 MS. WILKINSON: I'm going to
12 object. I don't think he even knows what
13 that means when you say "collections"
14 because it's something the lawyers do.

15 MS. BOLLES: I think we were just
16 talking about when Signal messages were
17 collected off his phone. My question is
18 what dates was that.

19 THE WITNESS: I don't know when
20 that was.

21 BY MS. BOLLES:

22 **Q Do you recall the years or year?**

23 A There's some things that lawyers
24 were handling so you'd have to ask them. They
25 would know.

212

1 **Q Do you know if Amazon also took a**
2 **forensic image of your phone?**

3 A I believe they did, yeah. I was
4 told that that's the way it works and I know
5 that it happened multiple times, but that's all
6 I know.

7 **Q Do you know why it happened**
8 **multiple times?**

9 A No.

10 **Q Did Amazon also forensically image**
11 **your company-issued laptop in connection with**
12 **this matter?**

13 A I think so. But I'm not sure.

14 **Q Did you have to relinquish your**
15 **laptop at that time?**

16 A I did, but my assistant would have
17 just done it.

18 **Q Who is your assistant?**

19 A Sharon Signorelli.

20 **Q Do you know if Amazon collected**
21 **your personal e-mails from Outlook or e-mail**
22 **for this matter?**

23 A I don't know.

24 **Q I'm going to hand you Plaintiff's**
25 **Exhibit 1585.**

213

1 (Copy of text messages was marked
2 PX1585 for identification.)
3 BY MS. BOLLES:
4 Q Have you reviewed the document?
5 A Yeah.
6 Q Do you recognize this document?
7 A It looks like messages, text
8 messages between myself and Jen Salke.
9 Q Do you see at the bottom it says
10 "You set disappearing message time to one
11 week"?
12 A Yes.
13 Q Does that indicate that these are
14 Signal messages?
15 A I don't know. You would know. I
16 think so. I don't know what it looks like. I
17 don't remember what the UI looks like for
18 Signal. That doesn't look like Apple texting
19 to me.
20 Q And do you have a disappearing
21 message function on your text messages?
22 A No. But there's many different
23 messaging apps. I use the Wickr one now.
24 Q Other than Wickr and Signal and
25 text message, have you used any other messaging

214

1 apps for work?
2 A No.
3 Q So it appears that you are
4 messaging with Jennifer Salke; is that right?
5 A That's what this looks like, yes.
6 Q And then at the top it says
7 "JBlack and Mike."
8 Do you see that?
9 A Yes.
10 Q Do you know who Mike is?
11 A That's probably Mike Hopkins.
12 Q There are two dates on the screen.
13 One is Monday, May 24, and one is July 13.
14 Can you confirm the year of these
15 messages? My understanding is that it is 2021,
16 but I would like to know if you agree with
17 that.
18 A Okay. Yeah, this is very shortly
19 after I came back to the company.
20 Q And was that in 2021?
21 A Yes.
22 Q At the bottom of the screen, you
23 write, "Thumbs up emoji. Jim Freeman, was
24 good, kind of what you've been saying all
25 along, old IP, more valuable to PV versus

215

1 model."
2 Do you see that?
3 A Yes.
4 Q What does that mean?
5 A It means that some of this -- in
6 our estimation of what -- some of this older
7 intellectual property like Creed or Rocky or
8 Bond was probably more valuable to us than kind
9 of our finance team was thinking.
10 Q And why is that?
11 A Because new ideas come along and
12 ways to create new projects that we -- that the
13 modelers don't think about. Like, for example,
14 here it looks like there's opportunity around a
15 game for James Bond. That would not be
16 something that you would capture in that model.
17 It's a new opportunity. That's my opportunity.
18 I'm just stating it here. It's kind of a
19 texting thing.
20 Q After that message was sent,
21 that's where it says "You set disappearing
22 message time to one week," right?
23 A I don't know what that is.
24 Q So you don't recall setting the
25 disappearing message time in May of 2021?

216

1 A No.
2 Q Do you recall if you continued to
3 discuss with Miss Salke and Mr. Hopkins
4 Prime Video on Signal?
5 A I don't know that we did very
6 much. I don't remember doing it very much, no.
7 I mean, if we did, it was only in a very
8 limited way.
9 Q At the bottom of the screen it
10 says "Tuesday, July 13," but then it's cut off.
11 Do you recall if anything happened
12 on Tuesday, July 13, 2021, on Signal?
13 A No.
14 Q I'm going to hand you what's been
15 marked as PX1586.
16 (Copy of text messages was marked
17 PX1586 for identification.)
18 Q Have you had a chance to review
19 the document?
20 A Yeah.
21 Q This document at the top says
22 "MHJS."
23 Do you see that?
24 A Yes.
25 Q Is that Mike Hopkins,

217

1 Jennifer Salke?

2 A I think so.

3 Q Do you see the date at the top
4 says "Tuesday, July 13"?

5 A Yes.

6 Q My understanding is that the year
7 is 2021, but does that sound right based on the
8 context of this document?

9 A I don't know. I don't have this
10 information.

11 Q This says "On Tuesday, July 13,
12 you disabled disappearing messages."

13 Do you see that?

14 A Yes.

15 Q Do you recall disabling
16 disappearing messages on July 13?

17 A No, but I know that I did at some
18 point.

19 Q You did at some point disable
20 disappearing messages?

21 A Yes.

22 Q Was that after you learned about
23 the disappearing message functionality?

24 A Yes. Someone explained how it
25 worked.

218

1 Q And was that when you came back to
2 Amazon in 2021?

3 A I don't remember when it was
4 exactly, the timing of that.

5 Q Was it after you came back to
6 Amazon?

7 A So this is like --

8 MS. WILKINSON: I think --

9 THE WITNESS: My lawyers have
10 talked to me about this stuff.

11 MS. WILKINSON: Can we consult off
12 the record for a moment?

13 MS. BOLLES: Yes, and if you want
14 to step outside, that's fine.

15 MS. WILKINSON: Let's step
16 outside.

17 (Brief recess.)

18 BY MS. BOLLES:

19 Q I think we established before we
20 took a short break that you did not recall
21 disabling disappearing messages on July 13; is
22 that right?

23 I might have that wrong so please
24 correct me if I'm wrong.

25 A I don't recall the date is what I

219

1 said. I didn't say that I didn't recall doing
2 it, I don't recall the date. I got guidance
3 from our legal department, and I made the
4 change. And I think that happened more than
5 one time, so -- and I did what they told me to
6 do.

7 Q By "more than one time," do you
8 mean like on multiple threads?

9 A No. No. There is at least one
10 time period. There may have been two. They
11 said, This has this functionality in it. You
12 need to turn it off.

13 MS. WILKINSON: Okay. You can't
14 say more. You can say you received
15 guidance on several occasions and after
16 that you turned it off.

17 Is that fair?

18 THE WITNESS: Yes. I think that's
19 what you're seeing here.

20 BY MS. BOLLES:

21 Q Did you receive a document
22 preservation notice in this matter?

23 A I don't know.

24 Q Do you know if you're currently
25 under a document preservation notice in this

220

1 matter?

2 A Yes, I am.

3 Q When did that begin?

4 A I don't know.

5 Q How do you know that you're
6 under -- I want to be clear.

7 A I don't know what this matter is
8 for. There's multiple things going on here.
9 There's many, many different matters for which
10 I get document preservation notices, so I can't
11 tell you specifically. When you say "for this
12 matter," the best way to answer is I don't
13 know. Yes, am I aware that I get document
14 preservation notices, yes, I am.

15 Q Did you receive a document
16 preservation notice in connection with the MGM
17 matter?

18 A Yes.

19 Q Did you receive a document
20 preservation notice in connection with any
21 other FTC investigations?

22 A I believe I have, yes.

23 Q Do you recall when that was?

24 A No.

25 Q I want to be clear that I'm not

221

1 asking for your advice of counsel, the
2 boundaries that we've drawn today.

3 What was your understanding of
4 whether Signal messages were covered by the
5 document preservation notices?

6 MS. WILKINSON: I'm going to
7 object because I think it's -- if I could
8 assist, give him a timeframe because
9 you're saying -- I think it's -- that
10 could affect the privilege issue. So if
11 you could make it a little more specific,
12 if you can, go ahead. He may or may not
13 be able to answer.

14 MS. BOLLES: That's fair.

15 BY MS. BOLLES:

16 Q At the time that you received the
17 document preservation notices, did you
18 understand whether Signal messages were covered
19 by them?

20 A I did not.

21 Q Did you ever learn that Signal
22 messages were or were not covered by the
23 document preservation notices?

24 A Again, that would be something I
25 discussed with lawyers.

222

1 MS. BOLLES: A yes-or-no answer is
2 all I'm looking for.

3 MS. WILKINSON: He said that's
4 something I discussed with lawyers.

5 MS. BOLLES: So is that a yes?

6 MS. WILKINSON: You can say yes.

7 THE WITNESS: Yes.

8 MS. WILKINSON: Then you just have
9 to say yes.

10 THE WITNESS: Yes. What am I
11 supposed to say?

12 MS. WILKINSON: It's something
13 lawyers focus on and we sometimes think
14 people that aren't lawyers remember a lot
15 more of the details than they do. No
16 problem, you just tell her what you
17 remember and what you don't.

18 BY MS. BOLLES:

19 Q I'm just looking for a yes or no
20 on this. I'm not trying to get into the
21 contents.

22 Did you receive any additional
23 training in document retention in connection
24 with this matter?

25 MS. WILKINSON: I'm going to

223

1 object here. When you say "this matter,"
2 there's multiple matters.

3 BY MS. BOLLES:

4 Q Do you understand the matter that
5 I'm referring to?

6 A No, I don't really know what
7 you're getting at.

8 Q Do you understand that in addition
9 to the MGM matter there is another FTC
10 investigation?

11 A Yes.

12 Q Do you understand that you've been
13 subpoenaed here today to testify as part of an
14 FTC investigation?

15 A Yes.

16 Q Do you feel confident that you
17 understand the scope of your document
18 preservation obligations pursuant to this FTC
19 investigation?

20 A I think I understand them in a
21 general way. I don't know how specifically you
22 would want my understanding to be, the depth of
23 that.

24 MS. WILKINSON: And there's
25 multiple investigations. You're implying

224

1 just two, sadly for Amazon, there's more
2 than that.

3 BY MS. BOLLES:

4 Q Did you receive additional
5 training on document retention in connection
6 with FTC investigations?

7 MS. WILKINSON: Again, I'm going
8 to object. Additional training? I don't
9 know that you established he received any
10 training. I believe he told you he
11 received legal guidance.

12 BY MS. BOLLES:

13 Q Did you receive training on
14 document retention in connection with FTC
15 investigations?

16 A I received legal guidance, e-mails
17 to me.

18 Q Did you ever receive a training?

19 A What do you mean by "a training"?

20 Q I'm just trying to establish --
21 you testified that you had e-mail guidance.
22 Was there anything else?

23 A No.

24 MS. WILKINSON: I'm going to
25 object. If you're going to start asking

225

1 about what the training is you're going
2 to get into --

3 MS. BOLLES: I'm asking about
4 whether the training existed, that's all.

5 MS. WILKINSON: Again, he asked
6 you what it was. He told you he received
7 legal guidance and he said one of the
8 ways was through e-mail.

9 MS. BOLLES: Yes. What format was
10 the legal guidance given in? Was it only
11 via e-mail?

12 MS. WILKINSON: If you've got
13 multiple formats you can say multiple.
14 Did you speak to lawyers face-to-face as
15 well as receive e-mails.

16 THE WITNESS: E-mail and
17 conversation.

18 BY MS. BOLLES:

19 **Q Who was the conversation with?**
20 **I'm not asking about the contents of the**
21 **conversation, just the name of the person it**
22 **was with.**

23 MS. WILKINSON: You can say the
24 name if you can remember, if it was one
25 or more people.

226

1 THE WITNESS: I remember talking
2 to Kelly Jo McArthur.

3 BY MS. BOLLES:

4 **Q And is that an Amazon attorney?**

5 A Yes.

6 **Q Do you recall when you spoke with**
7 **them?**

8 A No.

9 **Q I believe you mentioned Wickr in**
10 **your testimony earlier.**

11 **What is Wickr?**

12 A It's an Amazon messaging app.

13 **Q Is it also encrypted?**

14 A Yes. It's secure, similar to the
15 ways Signal was.

16 **Q Does it have an auto delete**
17 **feature?**

18 A I don't know.

19 **Q Have you used Wickr for work?**

20 A Yes, but only lightly and kind of
21 the same way, just a handful of people. I
22 don't use it for longer topics or business
23 decisions or things like that.

24 **Q Do you recall the date you started**
25 **using Wickr?**

227

1 A No. And, again, I received legal
2 guidance that that was a secure messaging app,
3 and we're using it.

4 **Q Have you ever asked anyone you**
5 **work with to use Wickr?**

6 A I don't know. Maybe.

7 **Q Who do you communicate with on**
8 **Wickr?**

9 A Andy Jassy, Jeff Bezos. Some of
10 my direct reports.

11 **Q How frequently do you use Wickr?**

12 A A couple times a week.

13 **Q Have you ever messaged about**
14 **Prime Video using Wickr?**

15 A I don't think so. But I may have.

16 **Q What about discussing business**
17 **strategy, have you discussed business strategy**
18 **on Wickr?**

19 A It depends what you mean by
20 "business strategy."

21 **Q I'm happy to defer to your**
22 **definition.**

23 A Like I said, it's not kind of a
24 substantial, in-depth conversations, but every
25 now and then something does come up and there's

228

1 emergency issues or urgent issues or something
2 like that and it does relate to business, so it
3 does happen. It's not the primary method.

4 **Q Do you still use Wickr for work**
5 **today?**

6 A Yes.

7 **Q Have you retained all of your**
8 **messages about work on Wickr?**

9 MS. WILKINSON: I don't think he
10 has an obligation to retain all of his
11 messages on Wickr. You're asking about
12 everything he does. Even with all the
13 investigations going on, I don't think
14 everything he does is -- he's required
15 to, so if you could stick to what you
16 were, which is -- I'm not sure he could
17 answer it, that could be responsive to
18 the investigations and maybe he keeps
19 them, but I don't want the implication
20 that he has to retain every message.

21 MS. BOLLES: I'm not implying
22 anything.

23 MS. WILKINSON: I know you're not.
24 I want the record to be clear that that's
25 not what you're focusing on. I think

229

1 you're focusing on that he's required to
 2 retain.
 3 MS. BOLLES: Sure. And I'm happy
 4 to parse that later with you, but for
 5 now, Mr. Blackburn, have you retained all
 6 of your messages about work on Wickr?
 7 THE WITNESS: I believe that I
 8 have, yes.
 9 BY MS. BOLLES:
 10 **Q Have you ever used Slack for work?**
 11 A The Twitch team uses Slack. We
 12 had a security incident with Twitch and at that
 13 time I needed to use it with them. But that's
 14 the only time that I was using it.
 15 **Q And do you recall when that was?**
 16 A The Twitch security problem was
 17 last fall some time, November or October a year
 18 ago.
 19 **Q 2021?**
 20 A Yes.
 21 **Q Do you still use Slack with the**
 22 **Twitch team?**
 23 A No.
 24 **Q How frequently did the Twitch team**
 25 **use Slack when it was in use?**

230

1 A Well, you know, it was an
 2 emergency-type event, so we were using it many
 3 times a day for a few weeks.
 4 **Q You said "a few weeks"?**
 5 A Yeah.
 6 **Q Do you know if you can share**
 7 **documents via Slack?**
 8 A I don't know. You can share a
 9 link to a document, a Cloud document. So
 10 that's what they would do.
 11 **Q Do you still have -- or let me ask**
 12 **this, did you use Slack on your computer or on**
 13 **your phone?**
 14 A I used it on my phone.
 15 **Q Was there an app that you had to**
 16 **download to use it?**
 17 A Yes.
 18 **Q Do you still have that app on your**
 19 **phone?**
 20 A I might. I'm not sure. It
 21 depends when I got the new phone. But I
 22 think -- I might. I don't use it, so -- but it
 23 might be on there.
 24 **Q Have you ever used WhatsApp for**
 25 **work?**

231

1 A Nope.
 2 **Q What about Telegram?**
 3 A No.
 4 **Q I believe you testified earlier**
 5 **that you had used text messages for work; is**
 6 **that right?**
 7 A Uh-huh.
 8 **Q What was the purpose of using text**
 9 **messages for work?**
 10 A Well, it just -- it's not that I
 11 want to, just that it -- it's kind of how when
 12 you're working very closely with people, it's
 13 just something that's done. I try very much to
 14 not have it be my work thing. I don't want it
 15 to be, but external people, our relationships
 16 with external people, they use it so then it
 17 starts to blend that way.
 18 **Q Do you recall having deleted**
 19 **work-related texts?**
 20 A No.
 21 **Q When you transferred phones, did**
 22 **they pull over your text messages?**
 23 A I think so, yeah.
 24 **Q When you transferred phones, did**
 25 **anyone at Amazon assist you with the switch?**

232

1 A I think our IT department made
 2 sure all of the apps that I was using were
 3 refreshed, yes.
 4 MS. BOLLES: I will take a short
 5 break and -- actually, let's go off the
 6 record.
 7 (Brief recess.)
 8 MS. BOLLES: Mr. Blackburn, I have
 9 no further questions for you today.
 10 Thank you so much for your time.
 11 MS. WILKINSON: We can go off the
 12 record.
 13 The deposition was concluded at
 14 5:37 p.m.
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25